

submits that the cited references fail to teach that wherein the authentication method is adapted to function without additional software infrastructure. Instead, Davis teaches that its transmission occurs "...during an encrypted session that has been established." Col. 2, lines 4-14. This encrypted session of Davis "...can be established using a KryptoKnight authentication key and distribution system." Col. 2, lines 41-50; see also col. 3, lines 34-37. To this extent, Davis requires additional software infrastructure such as KryptoKnight to provide its encrypted session. In contrast, the claimed invention includes "...wherein the authentication method is adapted to function without additional software infrastructure." Claim 1. As such, unlike Davis, which requires an encrypted session supplied by additional software infrastructure, the claimed invention is adapted to function without additional software infrastructure. Thus, Davis does not teach or suggest this feature of the claimed invention. Olkin does not cure this deficiency. Accordingly, Applicants respectfully request that the Office withdraw its rejection.

With respect to claim 3, Applicants respectfully submits that the cited references also fail to teach or suggest a process at the client data processing system applying the cipher function to the client password which corresponds to the stored cipher-protected client password, wherein the cipher function is an encryption algorithm and wherein the cipher-protected client password comprises a salt and a character string. The passage of Davis cited by the Office teaches "[a]t the client, the password is hashed at 321 and the SessionKey is decrypted at 323." Col. 4, lines 50-52. The Office argues that the hash function of Davis is a type of encryption. However, Davis never teaches that its hash function creates a cipher-protected client password that comprises a salt and a character string. The claimed invention, in contrast, includes "...a process at the client data processing system applying the cipher function to the client password which corresponds to

the stored cipher-protected client password,” “...wherein the cipher function is an encryption algorithm and wherein the cipher-protected client password comprises a salt and a character string.” Claims 1 and 3. As such, unlike Davis, the cipher function that is applied to the client password and that corresponds to the stored cipher-protected client password is an encryption algorithm that produces a cipher-protected client password that comprises a salt and a character string. For the above reasons, the hashing of the password in Davis does not teach the applying of the encryption algorithm cipher function of the claimed invention. Olkin does not cure this deficiency. Accordingly, Applicants request that the rejection be withdrawn.

With respect to the Office’s other arguments regarding dependent claims, Applicants herein incorporate the arguments presented above with respect to the independent claims from which the claims depend. Furthermore, Applicants submit that all dependant claims are allowable based on their own distinct features. Since the cited art does not teach each and every feature of the claimed invention, Applicants respectfully request withdrawal of this rejection.

**B. REJECTION OF CLAIMS 4, 5, 9, 10 and 11 UNDER 35 U.S.C. §103(a) OVER DAVIS IN VIEW OF OLKIN AND YATSUKAWA**

With regard to the 35 U.S.C. §103(a) rejection over Davis in view of Olkin and Yatsukawa, Applicants assert that the combined references cited by the Office fail to teach or suggest each and every feature of the claimed invention. For example, with respect to independent claim 9, Applicants respectfully submit that the combined references fail to teach or suggest that the server data processing system’s password repository is preferably integrated within the operating system of the server data processing system. The Office admits that Davis

and Olkin fail to disclose this feature. Office Action, page 6, para. [019]. Instead, the Office relies on a passage in Yatsukawa, which states:

FIG. 16 shows the system construction of the server provided for the present embodiment.

The server utilizes, as an OS, for instance, WINDSOS, MAC OS, UNIX, or NETWARE. The communication protocol used in the network is for instance, TCP/IP, OSI or NETWARE. Col. 19, lines 1-6.

The Office further cites a passage of Yatsukawa, which teaches an authentication server including a database. The Office asserts that these two passages in combination teach that "...the server data processing system's password repository is preferably integrated within the operating system of the server data processing system. However, the passages of Yatsukawa cited by the Office teach only that the authentication server includes a database and that the server's OS may be UNIX. To this extent, Yatsukawa does not expressly teach that the database is integrated within the operating system. Databases other than those that are integrated within operating systems, such as UNIX, may be used for authentication purposes. In contrast, the claimed invention includes "...wherein the server data processing system's password repository is preferably integrated within the operating system of the server data processing system." Claim 9. As such, the operating system of the server data process system of the claimed invention is not operating system on a server machine, where the server includes a database, as in Yatsukawa, but rather has a server data processing system's password repository preferably integrated within. Thus, the combined database and list of operating systems and protocols of Yatsukawa does not teach or suggest the server data processing system's password repository of the claimed invention. Accordingly, Applicants respectfully request that the Office's rejection be withdrawn.

With regard to the Office's other arguments regarding dependent claims, Applicants herein incorporate the arguments presented above with respect to independent claims listed above. In addition, Applicants submits that all dependant claims are allowable based on their own distinct features. However, for brevity, Applicants will forego addressing each of these rejections individually, but reserve the right to do so should it become necessary. Accordingly, Applicants respectfully request that the Office withdraw its rejection.

## **VI. CONCLUSION**

In addition to the above arguments, Applicants submit that each of the pending claims is patentable for one or more additional unique features. To this extent, Applicants do not acquiesce to the Office's interpretation of the claimed subject matter or the references used in rejecting the claimed subject matter. Additionally, Applicants do not acquiesce to the Office's combinations and modifications of the various references or the motives cited for such combinations and modifications. These features and the appropriateness of the Office's combinations and modifications have not been separately addressed herein for brevity. However, Applicants reserve the right to present such arguments in a later response should one be necessary.

In light of the above, Applicants respectfully submit that all claims are in condition for allowance. Should the Examiner require anything further to place the application in better condition for allowance, the Examiner is invited to contact Applicants' undersigned representative at the number listed below.

Respectfully submitted,



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